

# **PART 70 *SIGNIFICANT* SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Valeo, Inc. Engine Cooling Automotive Division  
1100 E Barachel Lane  
Greensburg, IN 47240**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 031-10782-00014	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) . The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a fabrication plant producing automobile condensers, radiators, and cooling modules.

Responsible Official: Mark Ryneerson  
Source Address: 1100 E Barachel Lane, Greensburg, IN 47240-1200  
Mailing Address: 1100 E Barachel Lane, Greensburg, IN 47240-1200  
Phone Number: (812) 662-3267  
SIC Code: 3714  
County Location: Decatur  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This *stationary* source is approved to construct and operate the following emission units and pollution control devices:

- (a) NOCOLOK Line # 6, with a capacity of 400 lbs/hr, consisting of:
- (1) four (4) fin mills, with a capacity of 0.21 gal oil/hr/mill,
  - (2) one (1) core assembly process,
  - (3) one (1) natural gas core conditioning oven, with a capacity of 4.0 MMBTU/hr, exhausting to stack PE-600A, B ,
  - (4) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-601,
  - (5) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-602,
  - (6) one (1) nitrogen electric braze oven, exhausting to stack PE-603A, B,
  - (7) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-604,
  - (8) one (1) natural gas paint dryoff oven, with a capacity of 0.4 MMBTU/hr, exhausting to stack PE-605.
- (b) NOCOLOK Line # 7, with a capacity of 300 lbs/hr, consisting of:
- (1) three (3) fin mills, with a capacity of 0.21 gal oil/hr/mill,
  - (2) one (1) core assembly process,
  - (3) one (1) natural gas core conditioning oven, with a capacity of 2.0 MMBTU/hr, exhausting to stack PE-700A, B ,
  - (4) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-701,
  - (5) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-702,
  - (6) one (1) nitrogen electric braze oven, exhausting to stack PE-703A, B,
  - (7) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-704,

(8) one (1) natural gas paint dryoff oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-705.

(c) NOCOLOK Line #3, with a capacity of 150 aluminum cores per hour, consisting of :

(1) three(3) fin mills, with a capacity of 0.49 gal/hr/mill.

(d) NOCOLOK Line #4, with a capacity of 80 aluminum cores per hour, consisting of :

(1) one(1) fin mill, with a capacity of 0.49 gal/hr/mill.

#### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This *stationary* source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

### SECTION B GENERAL CONSTRUCTION CONDITIONS

#### B.1 Permit No Defense [IC 13]

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This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### B.2 Definitions [326 IAC 2-7-1]

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

#### B.3 Effective Date of the Permit [IC13-15-5-3]

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

#### B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

#### B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

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This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (a) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification (SSM) will be included in the Title V draft.
- (b) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the SSM, then the SSM will go thru a concurrent 45 EPA review. Then the SSM will be incorporated into the final Title V permit at the time of issuance.
- (c) If the Title V permit has not gone thru final EPA review and would be issued after the SSM is issued, then the SSM would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

#### B.6 Phase Construction Time Frame

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this approval to construct if the:

- (a) Construction of NOCOLOK Lines #6 and #7 has not begun within eighteen (18) months from the effective date of this approval or if during the construction of NOCOLOK Lines #6 and #7, work is suspended for a continuous period of one (1) year or more.

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

## **SECTION C GENERAL OPERATION CONDITIONS**

### **C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### **C.2 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

### **C.3 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **C.4 Operation of Equipment [326 IAC 2-7-6(6)]**

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All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.5 Performance Testing [326 IAC 3-6]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

### C.6 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than *ninety (90) days* after receipt of this approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.7 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.



- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) Unless otherwise specified in this approval, any *quarterly* report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

NOCOLOK Line # 6, with a capacity of 400 lbs/hr, consisting of:

- (1) four (4) fin mills, with a capacity of 0.21 gal oil/hr/mill,
- (2) one (1) core assembly process,
- (3) one (1) natural gas core conditioning oven, with a capacity of 4.0 MMBTU/hr, exhausting to stack PE-600A, B ,
- (4) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-601,
- (5) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-602,
- (6) one (1) nitrogen electric braze oven, exhausting to stack PE-603A, B,
- (7) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-604,
- (8) one (1) natural gas paint dryoff oven, with a capacity of 0.4 MMBTU/hr, exhausting to stack PE-605.

NOCOLOK Line # 7, with a capacity of 300 lbs/hr, consisting of:

- (1) three (3) fin mills, with a capacity of 0.21 gal oil/hr/mill,
- (2) one (1) core assembly process,
- (3) one (1) natural gas core conditioning oven, with a capacity of 2.0 MMBTU/hr, exhausting to stack PE-700A, B ,
- (4) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-701,
- (5) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-702,
- (6) one (1) nitrogen electric braze oven, exhausting to stack PE-703A, B,
- (7) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-704,
- (8) one (1) natural gas paint dryoff oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-705.

NOCOLOK Line #3, with a capacity of 150 aluminum cores per hour, consisting of :

- (1) three(3) fin mills, with a capacity of 0.49 gal/hr/mill.

NOCOLOK Line #4, with a capacity of 80 aluminum cores per hour, consisting of :

- (1) one(1) fin mills, with a capacity of 0.49 gal/hr/mill.

**No Applicable requirements.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Valeo, Inc. Engine Cooling Automotive Division  
Source Address: 1100 E Barachel Lane, Greensburg, IN 46240  
Mailing Address: 1100 E Barachel Lane, Greensburg, IN 46240  
Source Modification No.: 031-10782-00014

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

## Indiana Department of Environmental Management Office of Air Management

An addendum to the  
Technical Support Document for a significant source modification to a not yet issued  
Part 70 Operating Permit

Source Name: **Valeo, Inc. Engine Cooling Automotive Division**  
Source Location: **1100 E Barachel Lane, Greensburg, IN 47240**  
County: **Decatur**  
SIC Code: **3714**  
Operation Permit No.: **031-10782-00014**  
Permit Reviewer: **Spahi**

On May 27, 1999, the Office of Air Management (OAM) had a notice published in the Greensburg Daily News, Greensburg, Indiana, stating that Valeo Inc. Engine Cooling Automotive Division had applied for a significant source modification to a not yet issued Part 70 Operating Permit to operate NOCOLOK lines #6 and #7. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (**bolded** language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

On June 17, 1999, Valeo, Inc. Engine Cooling Automotive Division submitted comments on the significant source modification to a not yet issued Part 70 permit. The summary of the comments is as follows:

### Comment 1:

Section A.1

Responsible official: Philip W. Zielinski  
Remove Philip Zielinski, add Mark Ryneearson

### Response to Comment 1:

The responsible official name will be changed.

Condition A.1 has been changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a fabrication plant producing automobile condensers, radiators, and cooling modules.

Responsible Official: ~~Philip W. Zielinski~~ **Mark Ryneearson**

**Comment 2:**

Section D.1.1

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and being air dried, the volatile organic compound(VOC) content of the oil(coating) delivered to the fin mills shall be limited to 3.5 pounds of VOC gallon of coating less water.

Valeo believes that the Miscellaneous Metal Coating Operation requirements are not applicable to Valeo for the following reasons:

- 1) The evaporative oil, which is used for lubricating a fin mill die, does not fall into the definition of coating. The aluminum stock is not coated. The oil is used for lubricating the die. The parts and the products do not require a coating and only hinder the process. Evaporative oils were used to reduce the unwanted residue left behind on the product.
- 2) Per 326 IAC 8-2-9(b): "This section is not applicable to the surface coating of the following metal parts and products or to the following types of coating as indicated in subsection (c)"  
  
"(8) Lubricants used to prevent sticking of internally moving parts." The oil is used to lubricate the die. Without a lubricant, the die sticks and mangles the stock. Therefore, 326 IAC 8-2-9(b) is applicable.
- 3) Past registrations for the same process did not identify this process as a Miscellaneous Metal Coating Operation.

Therefore, Valeo requests that the limitations of 3.5 pounds of VOC per gallon be removed from the permit, as it is not applicable to the process and no other similar process contains that restriction from previous reviews.

Emission limitations are not listed, please identify them.

**Response to Comment 2:**

After further review, it has been determined that rule 326 IAC 8-2-9 specifically applies to an "owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products...". Since the oil coating is applied to the die and not applied to the product being produced, it is decided that rule 326 IAC 8-2-9 does not apply to this use of the oil coating. The reference to rule 326 IAC 8-2-9 and its applicability to the oil coating delivered to the fin mills will be removed.

**Comment 3:**

Section D.1.3(1)

Records shall include purchase orders, invoices, and material safety data sheets(MSDS) necessary to verify the type and amount used;

These types of documents will verify plant-wide usage, but will not verify usage rates by the facility. Valeo uses oil usage logs to determine emissions for each regulated unit.

**Response to Comment 3:**

Since there are no applicable requirements for section D.1 of the permit, this condition shall be removed from the permit.

**Comment 4:**

Condition D.1.3(3)

The volume weighted VOC and HAP content of each oil used for each month:

Remove this sentence, it is in conflict with the Part 70 permit and is addressed in items (1)-(4).

**Response to Comment 4:**

Since there are no applicable requirements for section D.1 of the permit, this condition shall be removed from the permit.

**Comment 5:**

Condition D.1.3(4)

The total VOC and HAP usage for each month; and

“VOC usage” shall be “VOC emissions”. Remove “HAP” to agree with item D.3.3(3) of Part 70 permit. Change number from (4) to (3)

**Response Comment 5:**

Since there are no applicable requirements for section D.1 of the permit, this condition shall be removed from the permit.

**Comment 6:**

The weight of VOC and HAP emitted for each compliance period.

Change number (5) to (4) to agree with Part 70 permit.

**Response to Comment 6:**

Since there are no applicable requirements for section D.1 of the permit, this condition shall be removed from the permit.



**Comment 7:**

Report Forms

Source Modification Forms incorrectly list “ Mechanical Radiator” instead of NOCOLOK.

**Response to Comment 7:**

Since there are no reporting requirements needed for section D.1 of the permit, The report forms will be removed from the permit.